

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

RICHARD XIA, a/k/a YI XIA, et al.,

Defendants,

and

JULIA YUE, a/k/a JIQUING YUE, et al.,

Relief Defendants.

No. 21-cv-05350-PKC-RER

**JURY TRIAL DEMANDED**

STATE OF NEW YORK :  
: ss.  
COUNTY OF QUEENS :

**REPLY AFFIDAVIT OF RICHARD XIA**

RICHARD XIA, being duly sworn according to law, hereby declares and states as follows:

1. I am one of the defendants in this action. I submit this Reply Affidavit to provide information to the Court regarding the scope and depth of the extensive work I have performed on both the Eastern Mirage and Eastern Emerald Projects, which is relevant to some of the issues raised by the SEC in its opposition to the motion to vacate or modify the Asset Freezing Order. I have personal knowledge of the facts stated herein, and if called as a witness, I could and would testify competently thereto.

2. I have management oversight for the company Fleet Architects Inc., located at

13620 38th Ave, Suite 10f, Flushing, NY 11354. The responsible managing agent for Fleet Architects Inc. is Xi Verfenstein, a licensed architect in good standing in the State of New York. Xi Verfenstein's license number is 040416.

3. I am also a licensed professional engineer in good standing in the State of New York. My license number is 091221. My ID No. with the NYC Dept. of Buildings is N11034. As a Professional Engineer (PE) I am allowed to perform architectural design work, as well as signing and sealing architectural drawing in New York City under the Department of Buildings (“NYC DOB”). However, the use of the singular title “Engineer of Record” cannot, for my role in these projects, fully capture those deeper workloads with respect to obtaining NYC DOB approval of all architectural drawings. For example, during the design development phase for each project, I served as the Lead Architect. I was also the designated “Applicant” or “Applicant of Record” where applications were made to public authorities for approvals. As each of the projects moved into the construction phase, more work arose requiring the attention of the “Engineer of Record.” Thus, the individual “Role” I played with respect to the project is indicated with respect to each exhibit and document referenced below.

4. I am also a licensed NYC Dept. of Buildings Concrete Safety Manager in good standing in the State of New York. My license number is 2453.

5. I am also a Construction Site Fire Safety Manager certified by the New York City Fire Department, in good standing. My certification number is 86188059.

6. I am also a licensed NYC Dept. of Buildings Site Safety Manager, in good standing in the State of New York. My license number is 2667.

7. The development, design, architectural, and professional engineering services I have performed for the Eastern Mirage and Eastern Emerald Projects are extensive, and

voluminous records exist to substantiate that work at all levels. I personally participated in and completed a very challenging, multi-round, full design-build process through a special permit process with the Federal Aviation Administration (“FAA”), New York City Board of Standards and Appeals (“BSA”), Port Authority, New York City Department of Buildings (“NYC DOB”), New York City Department of Transportation (“NYC DOT”), New York City Department of Environmental Protection (“NYC DEP”), New York State Department of Environmental Conservation (“NYS DEC”), New York State (“NYS”) and New York State Energy Research & Development (“NYSERDA”).

8. To assist the Court, I am providing a sampling of project records from both Projects showing the depth and breadth of my involvement over approximately the last ten (10) years of development. The sampling of project records is by no means an exhaustive list of all the documents related to all the work I have performed for the Eastern Emerald and Eastern Mirage Projects.

9. Attached hereto as Exhibit 1 are true and correct copies of a sample of documents relating to the Brownfield Site Cleanup at 112-21 Northern Boulevard in Queens. These documents show a cross section of the efforts involved in site and soils remediation at the 112-21 Northern Boulevard site location. Descriptions of individual documents contained within Exhibit 1 are set forth below:

<b>Tab</b>	<b>Date</b>	<b>Name</b>	<b>Role</b>	<b>Description of Document</b>
1.1	12/12/2013	Richard Xia	Executive	112-21 Northern Blvd Product Recovery Proposal
1.2	12/20/2013	Richard Xia	Project Executive	Revised Fleet Product Recovery Proposal
1.3	1/8/2014	Richard Xia	Applicant	112-21 Northern Blvd C241157 Xia BCP LOC
1.4	4/18/2014	Richard Xia	Lead Engineer	Brownfield Cleanup Approval
1.5	11/4/2014	Richard Xia	Project Executive	C241157 RAWP MH comments

1.6	12/12/2014	Richard Xia	Project Executive	C241157 112-21 Northern Remedial Investigation Report
1.7	1/13/2015	Richard Xia	Project Executive	Roux-ISCO Injection Proposal
1.8	1/20/2015	Richard Xia	Applicant	112-21 Northern Blvd RWP- DD approval
1.9	1/20/2015	Richard Xia	Applicant	112-21 Northern DD final 1-20-15 w figures
1.10	1/21/2015	Richard Xia	Applicant	USA EPA Authorization letter for Northern Blvd
1.11	2/11/2015	Richard Xia	Executive	P Park NJ, LLC Application for Reclamation
1.12	2/19/2015	Richard Xia	Executive	112-21 Northern Blvd. Executed Remediation Proposal
1.13	2/20/2015	Richard Xia	Project Executive	Site Operations Plan - 2364
1.14	3/10/2015	Richard Xia	Executive	NJ residential soil
1.15	3/10/2015	Richard Xia	Executive	petroleum soil
1.16	3/12/2015	Richard Xia	Executive	112-21 Northern Boulevard Proposal
1.17	3/18/2015	Richard Xia	Applicant	2015 BCP COC Meeting Invitation 112-21 Northern
1.18	3/25/2015	Richard Xia	Project Executive	Monthly Progress Report- February 2015 - 2364
1.19	4/14/2015	Richard Xia	Applicant	C241157
1.20	4/23/2015	Richard Xia	Executive	112-21 Northern Boulevard Revised Proposal
1.21	4/30/2015	Richard Xia	Project Executive	
1.22	5/7/2015	Richard Xia	Project Executive	Monthly Progress Report, March 2015 2364 (rev)
1.23	5/20/2015	Richard Xia	Executive	Signed Soil Disposal Approval Request - 2364 (final)
1.24	6/5/2015	Richard Xia	Executive	OPL002 Approval Letter Final
1.25	6/19/2015	Richard Xia	Executive	Clean Earth Proposal Comments
1.26	6/23/2015	Richard Xia	Executive	Eastern Emerald
1.27	6/29/2015	N/A	N/A	DOT Building Operation permit 1
1.28	7/2/2015	Richard Xia	Project Executive	Monthly Progress Report-2015 May - 2364
1.29	8/10/2015	Richard Xia	Project Executive	Monthly Progress Report - June 2015 2364
1.30	8/11/2015	Richard Xia	Project Executive	Revised End-Point Soil Sampling Plan 2364
1.31	8/26/2015	Richard Xia	Project Executive	Revised Hot Spot Excavation Plan - 2364

1.32	8/31/2015	Richard Xia	Applicant	PBS Report 20150831
1.33	8/31/2015	Richard Xia	Project Engineer	Remedial Action Plan Markup
1.34	9/8/2015	Richard Xia	Project Executive	Progress Report, July 2015 - 2364
1.35	9/28/2015	Richard Xia	Project Executive	Monthly Progress Report- August 2015 - 2364
1.36	10/2/2015	N/A	N/A	Notice of Recording
1.37	10/14/2015	Richard Xia	Project Executive	112-21 Northern Blvd Site No 241157 - Revised Hot-Spot Remediation Plan
1.38	10/20/2015	Richard Xia	Project Executive	Monthly Progress Report September 2015 - 2364
1.39	10/26/2015	Richard Xia	Project Executive	112-21 Northern Blvd Site No 241156 Revised Hot Spot Delineation and Remediation Plan
1.40	11/24/2015	Richard Xia	Project Executive	Progress Report-October 2015 - 2364
1.41	11/30/2015	Richard Xia	Project Manager (Remediation Oversight and Project Quality Assurance)	Emerald Brownfield Final Engineering Report
1.42	12/23/2015	Richard Xia	Applicant	C241157 COC for 112-21 Northern Boulevard
1.43		Richard Xia	Owner and Applicant	112-21 Northern Blvd Petroleum Bulk Storage Application Form

10. Attached hereto as Exhibit 2 are true and correct copies of a sample of documents relating to Board of Standards and Appeals (“BSA”) for the Eastern Emerald Project. These documents include BSA related documents, for which I had primary responsibility for both projects as Lead Engineer for BSA Approval. Descriptions of individual documents contained within Exhibit 2 are set forth below:

Tab	Date	Name	Role	Description of Document
2.1	6/1/2014	Richard Xia	Project Engineer	Approved BSA Set Emerald
2.2	4/10/2019	Richard Xia	Lead Engineer	BSA submission
2.3	11/30/2020	N/A	N/A	BSA Final Approval 2019-74-BZ re:

				112-51 Northern Boulevard, Queens
2.4	4/18/2014	Richard Xia	Lead Engineer	Submission - Brownfield Cleanup Approval
2.5	2/26/2020	Richard Xia	Lead Engineer	Submission - Flight Obstruction and Circling Maps
2.6	3/12/2020	Richard Xia	Lead Engineer	Submission - REVISED Proposed Condition Plans
2.7		Richard Xia	Community Board Liaison	Community Board Presentation Material
2.8	8/25/2020	Richard Xia	Community Board Liaison	Public Outreach Summary
2.9	8/25/2020	Richard Xia	Lead Engineer	Design Study
2.10	8/25/2020	Richard Xia	Lead Engineer	Feasibility Study for Building without the Special Permit
2.11	8/25/2020	Richard Xia	Lead Engineer	REVISED Proposed Condition Plans

11. Attached hereto as Exhibit 3 are true and correct copies of a sample of documents relating to the professional engineering and architectural design work I performed for both Projects, including submissions, certifications, and analysis related to the designs. Descriptions of individual documents contained within Exhibit 3 are set forth below:

Tab	Date	Name	Role	Description of Document
3.1	1/26/2015	Richard Xia	Engineer of Record	Eastern Mirage DOB Approved Architecture Plans
3.2	1/26/2017	Richard Xia	Engineer of Record	Eastern Emerald DOB Approved Zoning and Architectural Plans
3.3	3/16/2020	Richard Xia	Engineer of Record	DOB Approved Architecture Plan - Eastern Mirage
3.4	12/18/2020	Richard Xia	Lead Architect	Eastern Emerald 65 DD
3.5	1/22/2021	Richard Xia	Lead Architect	Eastern Emerald Structural Progress
3.6	8/13/2021	Richard Xia	Engineer of Record	DOB Approved Architectural Plan - Eastern Emerald
3.7	9/10/2021	Richard Xia	Lead Architect	Eastern Emerald 50 DD ELECTRICAL
3.8	9/10/2021	Richard Xia	Lead Architect	Eastern Emerald 50 DD MECH
3.9	9/10/2021	Richard Xia	Lead Architect	Eastern Emerald 50 DD PLBG

3.10	9/10/2021	Richard Xia	Lead Architect	Eastern Emerald 50 DD SPRK
3.11		Richard Xia	Applicant & Design Professional	Eastern Mirage Signoff and TCO Checklist
3.12	8/18/2021	Richard Xia	Owner	MEP Geo Meeting Agenda
3.13	8/19/2021	Richard Xia	Owner	Task satisfaction confirmation
3.14	10/7/2021	Richard Xia	Owner	GEOThermal Engineering Proposal
3.15	10/22/2021	Richard Xia	Owner	Task 1 satisfaction confirmation
3.16	2/15/2021	Richard Xia	Lead Architect	Eastern Emerald - Concep Design Invoice
3.17	11/3/2021	Richard Xia	Lead Architect	Eastern Emerald - Facade-Details-IN-PROGRESS
3.18	11/4/2021	Richard Xia	Lead Architect	Eastern Emerald - LaGuardia Façade Access 100DD
3.19	N/A	Richard Xia	Lead Architect	Eastern Emerald - SASI Studio Concept Design Schedule Updated
3.20	N/A	Richard Xia	Lead Architect	Eastern Emerald - Floor Plan

12. Attached hereto as **Exhibit 4** are true and correct copies of a sample of documents relating to the work I performed Eastern Emerald Project, including Owner-Architect-Contractor (“OAC”) meeting minutes and memoranda. Descriptions of individual documents contained within **Exhibit 4** are set forth below:

Tab	Date	Name	Role	Description of Document
4.1	1/21/2020	Richard Xia	Lead Architect	Eastern Emerald - OAC-meeting memorandum
4.2	2/4/2020	Richard Xia	Lead Architect	Eastern Emerald - OAC-meeting memorandum
4.3	2/11/2020	Richard Xia	Lead Architect	Eastern Emerald - OAC-meeting memorandum
4.4	2/18/2020	Richard Xia	Lead Architect	Eastern Emerald - OAC-meeting memorandum
4.5	2/21/2020	Richard Xia	Lead Architect	Eastern Emerald - OAC-meeting memorandum
4.6	7/15/2020	Richard Xia	Lead Architect	Eastern Emerald - OAC-meeting memorandum
4.7	7/22/2020	Richard Xia	Lead Architect	Eastern Emerald - OAC-meeting memorandum
4.8	8/5/2020	Richard Xia	Lead Architect	Eastern Emerald - OAC-meeting memorandum

4.9	9/21/2020	Richard Xia	Lead Architect	Eastern Emerald - OAC-meeting memorandum
4.10	11/4/2020	Richard Xia	Lead Architect	Eastern Emerald - OAC-meeting memorandum
4.11	12/3/2020	Richard Xia	Lead Architect	Eastern Emerald - OAC-meeting memorandum
4.12	1/28/2021	Richard Xia	Lead Architect	Eastern Emerald - OAC-meeting memorandum
4.13	2/11/2021	Richard Xia	Lead Architect	Eastern Emerald - OAC-meeting memorandum
4.14	3/4/2021	Richard Xia	Lead Architect	Eastern Emerald - OAC-meeting memorandum
4.15	3/11/2021	Richard Xia	Lead Architect	Eastern Emerald - OAC-meeting memorandum
4.16	3/25/2021	Richard Xia	Lead Architect	Eastern Emerald - OAC-meeting memorandum
4.17	4/1/2021	Richard Xia	Lead Architect	Eastern Emerald - OAC-meeting memorandum
4.18	4/15/2021	Richard Xia	Lead Architect	Eastern Emerald - OAC-meeting memorandum
4.19	5/6/2021	Richard Xia	Lead Architect	Eastern Emerald - OAC-meeting memorandum
4.20	5/13/2021	Richard Xia	Lead Architect	Eastern Emerald - OAC-meeting memorandum
4.21	5/27/2021	Richard Xia	Lead Architect	Eastern Emerald - OAC-meeting memorandum
4.22	7/22/2021	Richard Xia	Lead Architect	Eastern Emerald - OAC-meeting memorandum
4.23	7/29/2021	Richard Xia	Lead Architect	Eastern Emerald - OAC-meeting memorandum
4.24	8/5/2021	Richard Xia	Lead Architect	Eastern Emerald - OAC-meeting memorandum
4.25	8/12/2021	Richard Xia	Lead Architect	Eastern Emerald - OAC-meeting memorandum
4.26	8/26/2021	Richard Xia	Lead Architect	Eastern Emerald - OAC-meeting memorandum
4.27	9/2/2021	Richard Xia	Lead Architect	Eastern Emerald - OAC-meeting memorandum
4.28	9/9/2021	Richard Xia	Lead Architect	Eastern Emerald - OAC-meeting memorandum
4.29	9/23/2021	Richard Xia	Lead Architect	Eastern Emerald - OAC-meeting memorandum
4.30	10/7/2021	Richard Xia	Lead Architect	Eastern Emerald - OAC-meeting memorandum
4.31	10/14/2021	Richard Xia	Lead Architect	Eastern Emerald - OAC-meeting memorandum

4.32	10/22/2021	Richard Xia	Lead Architect	Eastern Emerald - OAC-meeting memorandum
4.33	10/28/2021	Richard Xia	Lead Architect	Eastern Emerald - OAC-meeting memorandum

13. Attached hereto as Exhibit 5 are true and correct copies of a sample of documents relating to the professional engineering work I performed for the Eastern Mirage Project, including approved engineering drawings for the Project. Descriptions of individual documents contained within Exhibit 5 are set forth below:

<b>Tab</b>	<b>Date</b>	<b>Name</b>	<b>Role</b>	<b>Description of Document</b>
5.1	6/8/2016	Richard Xia	Engineer of Record	Electrical Plan Set
5.2	11/22/2017	Richard Xia	Engineer of Record	Electrical Control Plan Set
5.3	5/12/2020	Richard Xia	Lead Engineer	DOB EPR - QN00227 - Approved plans
5.4	2/29/2021	Richard Xia	Engineer of Record	LOW-VOLTAGE SET
5.5	7/26/2021	Richard Xia	Engineer of Record	Lighting Plan
5.6	5/24/2019	Richard Xia	Engineer of Record	DOB Approved Sprinkler Set
5.7	5/24/2019	Richard Xia	Engineer of Record	(OLD) DOB Approved Mechanical Set
5.8	7/26/2021	Richard Xia	Engineer of Record	New Approved MECH SET
5.9	8/30/2013	Richard Xia	Lead Architect	(Sample with Notes and details) DOB Approved Set-Plumbing
5.10	3/21/2021	Richard Xia	Engineer of Record	DOB Approved Plumbing Set
5.11	7/26/2021	Richard Xia	Engineer of Record	Approved PLUMBING SET
5.12	5/24/2019	Richard Xia	Engineer of Record	Approved Structure Set
5.13	8/20/2020	Richard Xia	Lead Architect	BACKYARD CORRIDOR Support of Excavation plan

14. Attached hereto as Exhibit 6 are true and correct copies of a sample of Design Construction Documents relating to the design and construction work I performed for the Eastern

Emerald Project. Descriptions of individual documents contained within Exhibit 6 are set forth below:

<b>Tab</b>	<b>Date</b>	<b>Name</b>	<b>Role</b>	<b>Description of Document</b>
6.1	6/13/2014	Richard Xia	Engineer of Record	DOB Plot Diagram of Zoning Lot
6.2	7/3/2014	Richard Xia	Engineer of Record	DOB Occupancy Use Plan Application
6.3	7/3/2014	Richard Xia	Engineer of Record	DOB Street Tree Checklist
6.4	7/7/2014	Richard Xia	Engineer of Record	Eastern Emerald Project DOB Architectural Approval
6.5	11/25/2014	Richard Xia	Engineer of Record	NYC Parks Street Tree Plan Application
6.6	12/15/2014	Richard Xia	Engineer of Record	Eastern Emerald Project DOB Architectural Approval
6.7	12/17/2014	Richard Xia	Engineer of Record	DOB Occupancy Use Schedule
6.8	12/17/2014	Richard Xia	Engineer of Record	DOB Zoning Diagram
6.9	1/12/2015	N/A	N/A	Eastern Emerald Project NYC DOT Permit
6.10	2/5/2015	N/A	N/A	Support of Excavation permit.pdf
6.11	3/18/2015	N/A	N/A	Eastern Emerald Project NYC DOT Permit
6.12	4/10/2015	N/A	N/A	Eastern Emerald Project NYC DOT Permit
6.13	4/16/2015	Richard Xia	Engineer of Record	DOB Plumbing Sprinkler Standpipe Schedule
6.14	4/16/2015	Richard Xia	Engineer of Record	DOB Plumbing Combined Sewer Connection Application
6.15	4/16/2015	Richard Xia	Engineer of Record	Eastern Emerald Project DOB Architectural Approval
6.16	4/17/2015	Richard Xia	Engineer of Record	Eastern Emerald Project DOB Architectural Approval
6.17	4/20/2015	Richard Xia	Engineer of Record	DOB Plumbing Sprinkler Standpipe Schedule
6.18	4/20/2015	Richard Xia	Engineer of Record	Eastern Emerald Project DOB Architectural Approval
6.19	4/23/2015	Richard Xia	Engineer of Record	Eastern Emerald Project DOB Architectural Approval
6.20	5/27/2015	Richard Xia	Engineer of Record	DOB Occupancy Use Schedule
6.21	6/30/2015			Support of Excavation permit
6.22	7/31/2015	Richard Xia	Engineer of Record	Eastern Emerald Project DOB Architectural Approval
6.23	12/5/2016	N/A	N/A	Support of Excavation permit
6.24	4/25/2017	N/A	N/A	Support of Excavation permit

6.25	5/4/2017	N/A	N/A	Support of Excavation permit
6.26	5/5/2017	N/A	N/A	Support of Excavation permit
6.27	7/8/2017	N/A	N/A	DOB Project Specific Insurance Summary
6.28	8/3/2017	N/A	N/A	Support of Excavation permit
6.29	8/15/2017	Richard Xia	Engineer of Record	Eastern Emerald Project DOB Architectural Approval
6.30	9/6/2017	N/A	N/A	Construction Fence permit
6.31	9/11/2017	N/A	N/A	Earthwork Permit
6.32	9/11/2017	Richard Xia	Concrete Safety Manager	Foundation work permit
6.33	9/26/2017	N/A	N/A	Construction Fence permit
6.34	11/20/2017	N/A	N/A	Construction Fence permit
6.35	11/20/2017	N/A	N/A	Earthwork permit
6.36	11/20/2017	N/A	N/A	Foundation permit
6.37	11/20/2017	N/A	N/A	Support of Excavation permit
6.38	3/26/2018	N/A	N/A	Construction Fence permit
6.39	3/26/2018	N/A	N/A	Foundation permit
6.40	3/26/2018	N/A	N/A	Support of Excavation permit
6.41	3/30/2018	N/A	N/A	Construction Fence permit
6.42	3/30/2018	Richard Xia	Concrete Safety Manager	Foundation work permit
6.43	5/15/2018	N/A	N/A	Support of Excavation permit
6.44	5/21/2018	N/A	N/A	Construction Fence permit
6.45	5/21/2018	N/A	N/A	Earthwork permit
6.46	5/21/2018	Richard Xia	Concrete Safety Manager	Foundation work permit.pdf
6.47	5/21/2018	N/A	N/A	Support of Excavation permit
6.48	6/28/2018	N/A	N/A	Foundation permit
6.49	6/28/2018	N/A	N/A	Support of Excavation permit
6.50	8/29/2018	Richard Xia	Engineer of Record	Eastern Emerald Project DOB Architectural Approval
6.51	10/11/2018	Richard Xia	Insurance Insurer	DOB Project Specific Insurance Summary
6.52	10/23/2018	N/A	N/A	Support of Excavation permit
6.53	11/29/2018	N/A	N/A	Support of Excavation permit
6.54	12/3/2018	N/A	N/A	Earthwork permit
6.55	11/5/2021	Richard Xia	Engineer of Record	DOB jobs highlight
6.56	11/5/2021	Richard Xia	Engineer of Record	Eastern Emerald Project NYC DOB Plan Examination Overview.pdf
6.57	11/5/2021	Richard Xia	Lead Architect	Electrical DD Progress

6.58	11/5/2021	Richard Xia	Lead Architect	Fire Alarm DD Progress
6.59	11/5/2021	Richard Xia	Lead Architect	Mechanical DD Progress
6.60	11/5/2021	Richard Xia	Lead Architect	Plumbing DD Progress
6.61	11/5/2021	Richard Xia	Lead Architect	Sprinkler DD Progress

15. Attached hereto as Exhibit 7 are true and correct copies of a sample of Eastern Mirage Design Construction Documents relating to the work I performed for that Project, including. Descriptions of individual documents contained within Exhibit 7 are set forth below:

<b>Tab</b>	<b>Date</b>	<b>Name</b>	<b>Role</b>	<b>Description of Document</b>
7.1	4/21/2014	Richard Xia	Engineer of Record	DOB Approved Occupancy Use Schedule 2
7.2	4/22/2014	Richard Xia	Engineer of Record	DOB Structural Approval.pdf
7.3	12/4/2014	Richard Xia	Engineer of Record	DOB Approved Occupancy Use Schedule 3
7.4	6/28/2015	Richard Xia	Engineer of Record	Construction Code Determination
7.5	6/29/2015	N/A	N/A	DOT Building Operation permit 1
7.6	7/15/2015	Richard Xia	Engineer of Record	DOB Approved Occupancy Use Schedule 4
7.7	11/2/2015	Richard Xia	Engineer of Record	Sand Lift Signoff
7.8	11/29/2018	Richard Xia	Site Safety Manager	New Building Permit
7.9	3/7/2019	Richard Xia	Engineer of Record	DOB Architectural Approval
7.10		Richard Xia	Engineer of Record	Eastern Mirage Project NYC DOB Full Approval Record
7.11		Richard Xia	Engineer of Record	Occupancy Use Schedule

16. Attached hereto as Exhibit 8 are true and correct copies of a sample of documents relating to the air rights approval work I performed, including Federal Aviation Authority (“FAA”) application and determinations for both Projects. Descriptions of individual documents contained within Exhibit 8 are set forth below:

<b>Tab</b>	<b>Date</b>	<b>Name</b>	<b>Role</b>	<b>Description of Document</b>
8.1	3/30/2015	Richard Xia	Applicant	Determination Of No Hazard To Air Navigation 2014-AEA-5646-OE
8.2	3/30/2015	Richard Xia	Applicant	Determination Of No Hazard To Air Navigation 2014-AEA-5645-OE

8.3	3/30/2015	Richard Xia	Applicant	Determination Of No Hazard To Air Navigation 2014-AEA-5647-OE
8.4	11/17/2016	Richard Xia	Applicant	Determination Of No Hazard To Air Navigation 2016-AEA-6284-OE
8.5	6/3/2015	Richard Xia	Applicant	Determination Of No Hazard To Air Navigation 2015-AEA-1142-OE

17. Attached hereto as Exhibit 9 are true and correct copies of a sample of the insurance work I performed, including insurance license for Fleet General Insurance Group, and certificates of insurance for both Projects. Descriptions of individual documents contained within Exhibit 9 are set forth below:

<b>Tab</b>	<b>Date</b>	<b>Description of Document</b>
9.1	11/16/2017	42-31 COI certificate 11.18.2017
9.2	11/1/2017	Fleet General Insurance Group - License
9.3	10/10/2018	Acord Certificate Union Street 2018-2019
9.4	9/27/2021	Acord Certificate 2021 Union St Emerald Creek
9.5	10/18/2021	Acord Certificate GL 2021 Northern Blvd Perini
9.6	10/10/2018	Acord Certificate Northern Blvd 2017
9.7	10/10/2018	Acord Certificate Northern Blvd 2018
9.8	10/18/2021	Acord Certificate Property 2021 Northern Blvd Perini
9.9	9/27/2021	Acord Certificate Property 2021 Union St Emerald Creek
9.10	11/8/2019	Union Street Perini Group General Liability 11.12.2019

18. Attached hereto as Exhibit 10 are true and correct copies of the licenses I hold, those held by Xi Verfenstein, and the safety registrations of Racanelli Construction Group, and Perini Group, Inc. Descriptions of individual documents contained within Exhibit 10 are set forth below:

<b>Tab</b>	<b>Licensee</b>	<b>Description of License</b>
10.1	Richard Yi Xia	Concrete Safety Manager
10.2	Richard Yi Xia	Engineer
10.3	Richard Yi Xia	Construction Site Fire Safety Manager
10.4	Richard Yi Xia	Site Safety Manager

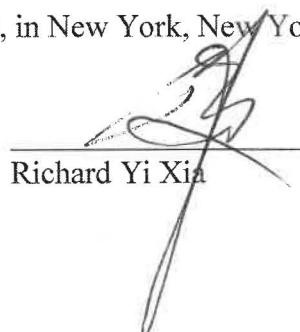
10.5	Racanelli Construction Group	Safety Registration 607300 — Const. Concrete, Demolition
10.6	Perini Group, Inc.	Safety Registration 616670 — Const. Concrete, Demolition
10.7	Xi Verfenstein	Construction Site Fire Safety Manager
10.8	Xi Verfenstein	Architect

19. Attached hereto as Exhibit 11 are true and correct copies of a sample of the project tax related records I prepared and oversaw for both Projects. Descriptions of individual documents contained within Exhibit 11 are set forth below:

Tab	Date	Name	Role	Description of Document
11.1	12/31/2009	Richard Xia	Applicant	ICAP Preliminary Application (Mirage)
11.2	11/11/2014	Richard Xia	Applicant	ICAP Preliminary Notice of Approval (Mirage)
11.3	9/7/2018	Richard Xia	Applicant	ICAP Eastern Emerald filing
11.4	11/16/2018	Richard Xia	Applicant	ICAP Eastern Mirage Amendment Filing (Mirage)

20. I swear and affirm the foregoing under penalty of perjury under the laws of the United States that the foregoing statements are true and correct to the best of my knowledge, information, and belief.

Executed this 23rd day of September, 2022, in New York, New York.



Richard Yi Xia

Sworn to and Subscribed Before Me  
This 23rd day of September, 2022

Chul Young Kim  
NOTARY PUBLIC

CHULYOUNG KIM  
Notary Public, State of New York  
No. 01KI6151172  
Qualified in Nassau County  
Commission Expires Aug 14, 2026